DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



September 24, 1990

ALL COUNTY LETTER No. 90-90

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: POSTPONED VERIFICATION FOR FOOD STAMP EXPEDITED SERVICE

REFERENCE: MANUAL SECTIONS 63-301.545(a) AND 63-301.71

The purpose of this letter is to provide County Welfare Departments (CWDs) with policy clarification regarding households that are certified pending verification for longer than one month under expedited service (ES) and fail to submit the postponed verification within 30 days from the date of application. This clarification is a result of written instructions from FNS, Western Region Office.

Manual Section 63-301.545(a) states in part that: "When a certification period of longer than one month is assigned, . . . the household's participation shall be terminated if the verification is not completed within 30 days following the date the application was filed. . . "

Previous State policy was that termination would occur only if the postponed verification which was not provided was a factor of eligibility (i.e., income, resources, etc.). For noneligibility factors such as deductions, failure to provide the verification would result in the disallowance of the deduction (in the second and succeeding months) rather than discontinuing the household.

Based upon the clarification received from FNS, a household subject to the provisions of Manual Section 63-301.545(a), will have its participation terminated for any verification affecting the household's eligibility and benefit level which is not provided within 30 days from the date of application. However, if the postponed verification was an individual eligibility factor (e.g., Social Security Numbers, alien status, etc.), only the affected individual household member would be discontinued; not the entire household.

In addition, an issue was raised whether ES provisions take precedence over categorical eligibility (CE) rules in situations of pending verification. Households which are certified under ES are subject to all requirements of those provisions. Therefore, households with postponed verification will not remain certified or be reinstated (if discontinued) based on their CE status unless the postponed verification is submitted.

The above policy will be <u>effective December 1</u>, <u>1990</u>. The following examples are provided for additional clarification:

EXAMPLE #1

A member of the applicant household does not have a Social Security Number (SSN) or proof of application for one within the ES processing timeframe.

EXAMPLE #2

Applicant household is missing verification of a deduction which cannot be provided within the ES timeframe.

The CWD would certify the household and allow the deduction in the month of application with postponed verification. If the postponed verification is not received by the 30th day following application, the household is discontinued.

EXAMPLE #3

A household files a joint application for AFDC and Food Stamps and is determined entitled to ES with postponed verification of a deduction. The household is later determined eligible to AFDC and becomes CE. The postponed verification of the deduction is not provided by the 30th day from the date of application.

As a result of the household being certified under ES, all requirements would still apply. Therefore, as the postponed verification (of the deduction) would affect the household's eligibility or benefit level, the household would be discontinued.

EXAMPLE #4

A household files a joint application for AFDC and Food Stamps and is determined entitled to ES. A member of the household does not

have a SSN or proof of application for one. The household is certified for Food Stamps pending submittal of SSN information. The information is not submitted by the 30th day following application. Subsequent to the 30th day, the household is approved for AFDC and becomes CE.

Since the missing SSN information (an individual eligibility factor) was not provided by the 30th day, that household member's participation would be terminated. In addition, as CE status does not take precedence over ES provisions, the affected household member would continue to be ineligible until the SSN information was provided.

If you have any questions, please contact Michael Papin of the AFDC and Food Stamp Policy Implementation Bureau at (916) 324-6584.

ROBERT A. HOREL Deputy Director

cc: CWDA